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**From:** Beck, Nancy [Beck.Nancy@epa.gov]  
**Sent:** 10/30/2017 10:36:13 PM  
**To:** Baptist, Erik [baptist.erik@epa.gov]; Dourson, Michael [dourson.michael@epa.gov]  
**Subject:** FW: Your SNUR Regs/procedures inquiry  
**Attachments:** SNUR Regs 7-27-88.pdf

FYI

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Ex. 6 Personal Privacy (PP)

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**From:** Blunck, Christopher  
**Sent:** Monday, October 30, 2017 5:03 PM  
**To:** Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>  
**Cc:** Morris, Jeff <Morris.Jeff@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>; Mottley, Tanya <Mottley.Tanya@epa.gov>  
**Subject:** Your SNUR Regs/procedures inquiry

Nancy -- Per your request at today's TRI ICR-related meeting where broader burden-related questions come up at the end of the discussion, including one from you on SNUR procedures and downstream notice, the following is hopefully useful:

SNUR regs and misc procedures that may be applicable in particular chemical or category-specific SNURs are at [40 CFR part 721](#).

For background on the regs, 40 CFR [721.1](#) on "Scope and applicability" may be particularly useful, including for understanding the functions of the misc subparts in 40 CFR part 721.

Relevant to a specific question you raised today, you'll see that 40 CFR 721.1(b) indicates the General Provisions of 40 CFR subpart A apply *unless they conflict with a specific SNUR provision at 40 CFR 721 subpart E*; subpart E is where significant new uses applicable to specific chemicals and other provisions applicable to the chemical-specific rules are identified.

Reporting requirements, including downstream notice requirements, are in subpart A at 40 CFR [721.5](#), "Persons who must report". You will see that 40 CFR 721.1(c) cross-references the PMN regs at [40 CFR part 720](#); PMN reg procedures apply to SNURs except where the part 721 provisions conflict.

A 7/88 final rule FR notice is attached, where, among other things, the downstream notice general requirements were added to the SNUR procedures. There were numerous other FR notices adding or amending Part 721 over time, and many, many chem -specific SNURs have been issued resulting in amendments to 40 CFR 721 subpart E (and for which the procedures/provisions in 40 CFR 721 Subparts A, B, C, D may be applicable).

I hope this is useful and responsive, and please let me know if you'd like other info.

*Chris Blunck*

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